

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**U.S. SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

VLADISLAV KLIUSHIN, *et al.*,

Defendants.

Case No. 1:21-cv-12088-DLC

**DECLARATION OF JAMES CONNOR IN SUPPORT OF PLAINTIFF'S
NOTICE OF COMPLETION OF SERVICE BY ALTERNATIVE MEANS BY EMAIL**

I, James Connor, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am employed as a trial attorney by the United States Securities and Exchange Commission ("SEC") in the Division of Enforcement, at the SEC's headquarters office in Washington, D.C. Along with my co-counsel, I represent the SEC in the above-captioned matter.

2. On April 21, 2022, I emailed a copy of the Complaint (ECF No. 1), Summons, and Electronic Order granting the SEC's Motion for Alternative Service (ECF No. 13) to Defendants Nikolai Rumiantcev, Mikhail Irzak, Igor Sladkov, and Ivan Yermakov ("Defendants") at the following email addresses:

Defendant	Email Address
Nikolai Rumiantcev	nr@m13.su
Mikhail Irzak	mikka777@yahoo.com
Igor Sladkov	isladkov@mail.ru
Ivan Yermakov	i.s.ermakow@yandex.ru

3. My emails to Defendants attaching the Complaint, Summons, and Electronic Order are attached hereto as Exhibit 1 (email to Nikolai Rumiantcev); Exhibit 2 (email Mikhail Irzak); Exhibit 3 (email to Igor Sladkov); and Exhibit 4 (Ivan Yermakov).

4. I did not receive a bounce-back notification or any other notification indicating that my emails were not delivered to the email addresses identified in paragraph 2 of this Declaration.

I declare under penalty of perjury under the laws of the United States of America, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: April 22, 2022

/s/ James P. Connor
James P. CONNOR